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 COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHELLE CHISM,)	
)	
Plaintiffs,)	Case No. 2:20-CV-967-JAD-BNW
)	
vs.)	
)	
COSTCO WHOLESALE CORPORATION,)	
DOES I – V; ROE CORPORATIONS I - X;)	
)	ECF No. 37
Defendants.)	
)	
)	

**STIPULATION AND ORDER TO EXTEND TIME FOR COSTCO TO FILE
 REPLY TO OPPOSITION TO MOTION FOR SUMMARY JUDGMENT
 AND OPPOSITION TO COUNTERMOTION FOR SPOILATION INSTRUCTION**

Defendant, COSTCO WHOLESALE CORPORATION (hereinafter referred to as
 “Costco”) by and through counsel, Edgar Carranza, Esq. of the BACKUS, CARRANZA & BURDEN
 law firm and Plaintiff, MICHELLE CHISM (hereinafter referred to as “Plaintiff” or “Ms.
 Chism”), by and through counsel, Peter Angulo, Esq. of the Angulo Law Group, hereby stipulate
 and agree that Defendant, Costco shall have until **December 20, 2021**, in which to file its Reply to
 Plaintiff’s Opposition to Motion for Summary Judgment and Opposition to Countermotion for

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Spoilation Instruction. This is the first extension requested.

I. GOOD CAUSE SUPPORTING THE EXTENSION.

The parties come to this Court seeking an extension of the briefing schedule related to Costco's Motion for Summary Judgment [Doc. 28] and Ms. Chism's Opposition to Defendant's Motion for Summary Judgment and Countermotion for Spoilation Instruction [Doc. 31]. The parties have completed a significant amount of discovery and continue to diligently move this case forward.

Costco filed its Motion for Summary Judgment [Doc. 28] on October 28, 2021. The parties subsequently agreed to allow Ms. Chism additional time to file her response to the motion in light of her counsel's travel schedule, Thanksgiving Day holiday commitments and commitments in other litigated/contested matters. The parties submitted a stipulation and order to this Court for the additional time on November 18, 2021 [Doc. 30], which this Court subsequently granted.

On November 29, 2021, Ms. Chism filed her Opposition to Costco's Motion for Summary Judgment and Countermotion for Spoilation Instruction [Doc. 31].

The parties now have agreed to allow Costco additional time to file its Reply to Plaintiff's Opposition to Motion for Summary Judgment and its response to Plaintiff's Countermotion for Spoilation Instruction. The additional time is necessary due to Costco counsel's commitments in other litigated matters which have prevented him from finalizing the above reply including, but not limited to, a dozen expert depositions in a contested mass-tort/ asbestos matter, *Potter v. Crane Co., et. al.*, Case No. 2:20-CV-00276-RFB-VCF and party depositions in another mass-tort/ silica matter, *Nunez v. Robert Bosch Tool Corp., et. al.*, Case No. A-19-801186-C. The extension is only for an additional seven (7) days and will not delay this matter any further than is necessary to allow for a full briefing of the issues.

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II. DEADLINES FOR REPLY AND OPPOSITION TO COUNTERMOTION.

Accordingly, the parties hereby agree and stipulate to allow for additional time to complete the briefing as follows:

TASK	CURRENT DEADLINE	NEW DEADLINE
Costco's Reply to Plaintiff's Opposition to Motion for Summary Judgment and Opposition to Plaintiff's Countermotion for Spoliation Instruction	December 13, 2021	December 20, 2021

DATED this 14th day of December, 2021.

BACKUS, CARRANZA & BURDEN

By: /s/ Edgar Carranza

Edgar Carranza, Esq.

Nevada Bar No. 5902
3050 South Durango Drive
Las Vegas, Nevada 89117
Attorney for Defendants
COSTCO WHOLESALE
CORPORATION

DATED this 14th day of December, 2021.

Angulo Law Group

By: /s/ Peter M. Angulo

Peter M. Angulo, Esq.
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5545 S. Mountain Vista Street, Suite F
Las Vegas, Nevada 891206
Attorneys for Plaintiff
MICHELLE CHISM

IT IS SO ORDERED.

DATED this 21st day of December, 2021, nunc
pro tunc to December 13, 2021


United States District Court Judge